

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Erick FRAYRE-Rendon (24)**Rio Grande, Zacatecas, Mexico**

Case No.

L-21-MJ-_____

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 9, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 1001

Offense Description

Whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
- (2) makes any materially false, fictitious, or fraudulent statement or representation; or
- (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

This criminal complaint is based on these facts:

On or about October 09, 2021, at approximately 3:38 am, defendant, Erick FRAYRE-Rendon, a citizen and national of Mexico, applied for admission into the United States at the Lincoln Juarez Port of Entry in Laredo, Texas, as a passenger on a commercial bus. At primary inspection, defendant presented a State of Georgia Birth Certificate bearing the name of Y.F.R. to primary CBPO Christian John Sy. During primary questioning, the defendant claimed to be a United States Citizen. When asked where he had been born, the defendant stated the United States. When asked if he was utilizing the document presented to apply for entry into the United States, the defendant stated yes. Defendant stated he was coming from Zacatecas and was traveling to Wichita, KS where he planned to reside. Defendant was referred to secondary for further inspection. During the pat down, a Mexican Voting Card, bearing the defendant's photograph and name of Erick FRAYRE-Rendon, was found inside the defendant's shoe. Defendant was read his rights via form I-214. Defendant waived his rights and agreed to provide a statement. Defendant identified himself as Erick Abner FRAYRE-Rendon, a citizen and national of Mexico, born in Rio Grande, Zacatecas, Mexico on August 01, 1997. Defendant stated the document presented belonged to his brother & had been provided by his mother. Facts are based on the defendant's sworn statement & records of Customs & Border Protection. The defendant was paroled into the United States and an Immigration hold has been placed.

☐ Continued on the attached sheet.
/s/ Cynthia C. O'Bryant*Complainant's signature*Cynthia C. O'Bryant, CBP Enforcement Officer*Printed name and title*

Sworn to before me and signed in my presence.

Date: October 12, 2021*Judge's signature*City and state: Laredo, TexasChristopher Dos Santos, U.S. Magistrate Judge*Printed name and title*